JUDD BURSTEIN, P.C.

JUDD BURSTEIN*
JBURSTEIN@BURLAW.COM

PETER B. SCHALK**
PSCHALK@BURLAW.COM

EMILY C. FINESTONE***
EFINESTONE@BURLAW.COM

*ALSO ADMITTED IN CONNECTICUT

**ALSO ADMITTED IN NEW JERSEY

***ALSO ADMITTED IN MASSACHUSETTS,
PENNSYLVANIA. AND VIRGINIA

260 MADISON AVENUE 15TH FLOOR NEW YORK, NEW YORK 10016 TEL: (212) 974-2400 FAX: (212) 974-2944 WWW.BURLAW.COM

I 2 OLD HILL FARMS ROAD
WESTPORT, CONNECTICUT 06880

The pre-motion conference scheduled for July 20, 2022, is **adjourned sine** die.

VIA ECF

SO ORDERED.

Hon. Lorna G. Schofield

United States District Court Dated: June 17, 2022
Southern District of New York New York, New York

500 Pearl Street

New York, New York 10007

LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

Re: Planck LLC, d/b/a, Patch Media v. Particle Media, Inc., d/b/a, News Break et al.,

Case No. 20-cv-10959 (LGS)

Dear Judge Schofield:

We write to request clarification of the Court's June 9, 2022 Order (Dkt. No. 100). On June 9, 2022, the Court granted the parties' joint request for a sixty-day stay of discovery to pursue potential resolution by mediation. (Dkt. No. 100). However, the June 9, 2022 Order did not remove the previously scheduled July 20, 2022 pre-motion conference from the calendar. (*See* Dkt. No. 96, at § 13(c)). The July 20, 2022 pre-motion conference date triggers the parties' deadlines for filing pre-motion letters concerning dispositive motions and responses to the same.

In light of the temporary stay of discovery, we anticipated that the pre-motion letters concerning dispositive motions and the pre-motion conference for any dispositive motions would also be temporarily stayed. We respectfully request that the Court clarify whether the July 20, 2022 pre-motion conference date, as well as the corresponding deadlines for filing pre-motion letters and responses, will be rescheduled in accordance with the scheduling changes set forth in the June 9, 2022 Order.

/s/ Judd Burstein

Judd Burstein
JUDD BURSTEIN, P.C.

Attorneys for Plaintiff

/s/ Kelly M. Klaus

Kelly M. Klaus

MUNGER, TOLLES & OLSON LLP

Attorneys for Defendants